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May 22, 2008

Honorable Barbara S. Jones
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St, Room 620
New York, NY 10007

Re: ACS Recovery Services, Inc. v. Alvin Wilmore, Jr. and Carolyn Wilmore
Civil Action No. 08-cv-2017 (S.D.N.Y.)

Dear Judge Jones:

This firm represents plaintiff ACS Recovery Services, Inc. ("ACS") in the above captioned action. I write this letter with the consent of Jason Bernstein, counsel for defendants Alvin Wilmore, Jr. and Carolyn Wilmore, to request that the Court stay proceedings in this action for 60 days.

ACS filed this action to enforce its lien as to any recovery obtained by defendants in a separate state court action, captioned *Alvin Wilmore, Jr., an infant by his mother and natural guardian Carolyn Wilmore, and Carolyn Wilmore, individually, v. New York City Housing Authority*, filed in the Supreme Court of New York, Bronx County, under Index Number 020002/2002. Defendants were paid medical benefits, as beneficiaries of an employee welfare benefit plan governed by the Employee Retirement Income Security Act of 1974, in connection with certain injuries and in the state court action are seeking to recover for those same injuries. Counsel for ACS has had initial settlement discussions with counsel for defendants and the parties are hopeful that resolution of the state court action will allow them amicably to resolve ACS' lien and therefore its claims in this case.

In order to allow the parties' discussions to continue and events in defendants' state court action to develop, the parties hereby respectfully request that the Court stay this action for sixty (60) days from the date of this letter.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'M. Alexander Bowie II', written over a horizontal line.

M. Alexander Bowie II



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cc: Theodore H. Katz, U.S.M.J.
Jason Bernstein, Esq., Gary B. Pillersdorf & Associates (via facsimile and regular mail)